

THE LAW OFFICES OF

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January 31, 2023

Honorable Paul G. Gardaphe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

In Re: Sunset Equities LTD. and Ron Hershco  
-against-  
Donald J. Urgo & Associates, LLC, et al  
Civil Action 1:22-cv-08857

Honorable Sir:

I represent the Plaintiffs, Sunset Equities LTD. and Ron Hershco (Collectively "Sunset") in the above-captioned action and write concerning the conference scheduled in this matter for February 2, 2023. I was just advised that a matter which had been adjourned and marked final in the Supreme Court, Kings County, for February 2, 2023, has been scheduled for a mandatory and in person oral argument at the time of the conference scheduled in this matter. This conflict was previously unknown to me and entirely unanticipated, given that the State Court Justice before whom the matter is pending only resumed in person appearances as of January 26, 2023. The Supreme Court matter is *Shaul Amzalag v. ZBT Holdings Inc. et al* (Index Number 509474/2020) and is pending before the Honorable Debra Silber of that Court. I have discussed this conflict with my adversary who prefers to go forward on February 2, but has consented to an adjournment, subject to Mr. Mauriello's availability on the future adjourn date.

On another but related matter, there is a submission due today in response to a letter filed by the Defendants on January 24, 2023, and for which I am awaiting information from counsel in The Bahamas. I discussed this too with Defendants' counsel, in the context of their position on a possible extension of the deadline for Plaintiff to file same. Counsel's position was that I file the letter without the materials I am waiting on and then supplement same if and when such information becomes available. It would of course be my preference to present the materials requested by the Court in a single submission. I am therefore also requesting a brief extension of time within which to file Plaintiff's letter responding to the Defendants' January 24, 2023 letter.

A draft copy of this letter was provided to Mr. Mauriello in advance of its filing, with his consent also to my advising the Court that the letter's contents were acceptable to him and that he had seen it in advance of its submission to the Court. This is the first request to extend the dates which are subject of this letter. Thanking you in advance for your attention to this matter, and in anticipation of your direction as to how to proceed, I remain,

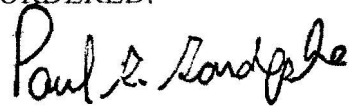
Respectfully yours,

  
Bradley S. Gross

cc: all sides by ECF

**MEMO ENDORSED:** The application is granted. Plaintiffs' submission is due by **February 7, 2023**. The conference currently scheduled for February 2, 2023 is adjourned to **February 9, 2023 at 11:00 a.m.**

SO ORDERED.

A handwritten signature in black ink, reading "Paul G. Gardephe". The signature is written in a cursive, flowing style with a large initial 'P'.

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Paul G. Gardephe  
United States District Judge  
Dated: January 31, 2023